

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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Attorney for the Debtor, Dayna Pimentel

IN RE:	:	Case No. 19-18920 JNP
	:	
	:	
Dayna Pimentel aka Dayna Ilvelisse Pimentel	:	
Ortiz,	:	
Debtor	:	
	:	
James Santiago	:	
Co-Debtor	:	
	:	Hearing date:
	:	
	:	Judge Poslusny

CERTIFICATION OF COUNSEL IN OPPOSITION
TO CREDITOR'S CERTIFICATION OF DEFAULT

I, David A Snyder, Esquire, hereby certify as follows:

1. I am the Attorney for the Debtor, Dayna Pimentel, and I am fully familiar with the facts set forth below.

2. The Creditor, Selective Portfolio Servicing, Inc. of Legacy Mortgage Asset Trust; through its counsel, filed a certification of default against the Debtor, on or about December 1,

2023, alleging the Debtor was in default of the Consent Agreement Resolving the Post Petition Arrears, entered into between the parties, on December 15, 2020.

3. The Creditor claimed the Debtor was in default by missing payments subsequent to the entry of the Consent Order.

4. The Debtor disputes the Creditor's claims of missed payments.

5. The Debtor through counsel submits that the Debtor's post-petition mortgage payments are current via confirmation with her lender by telephone on December 14, 2023.

6. The Debtor further submits only the current payment for December is due; thereby making her current and not in arrears.

7. Based upon the foregoing the Debtor respectfully asks this Honorable Court to deny the Creditor's request for a default and deny the Creditor's application to vacate the automatic stay.

8. I certify under penalty of perjury that the above is true.

Date: 12/14/2023

/s David A Snyder
David A Snyder, Esquire
Counsel for the Debtor